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June 19, 2015

ACCEPTED/FILED

OCT - 8 2015

Marlene H. Dortch
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: Aviat Networks, Request for Waiver of Certain Antenna
Requirements in the 71-76 and 81-86 GHz Bands

Dear Ms. Dortch:

CBF Networks, Inc. (d/b/a Fastback Networks) ("Fastback") wishes to be included in the Request for Waiver that was filed with the Commission on April 5, 2013 by Aviat Networks, as amended by Aviat on March 14, 2014 (the "Aviat Waiver Request").¹ Aviat requested a partial waiver of the antenna standards for the 71-76/81-86 GHz bands that are set forth in Section 101.115 of the Commission's rules. Fastback seeks the same relief, subject to the same conditions, sought by Aviat.

Fastback manufactures high-speed outdoor wireless networking products that connect metropolitan area fiber optic networks to broadband access points such as commercial buildings, cellular base stations, or WiFi hotspots. Its ability to make available its products in the 71-76/81-86 GHz bands has been severely constrained by the antenna standards set forth in Section 101.115 of the Commission's rules which, as set forth in the Aviat Waiver Request, are geared for larger parabolic antennas that are not capable of meeting today's requirements for smaller, lighter, short range, and less expensive antennas suitable for installation and operation near street level in congested urban environments.

In 2012, the Fixed Wireless Communications Coalition ("FWCC") urged that the Commission amend certain provisions of Section 101.115 to permit smaller antennas at

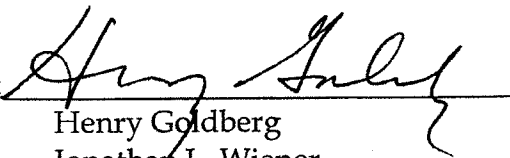
¹ On November 10, 2014, Aviat requested that Radio Frequency Systems ("RFS") be made a party to the Aviat Waiver Request.

71-76/81-86 GHz.² As noted above, in 2013, Aviat filed its Waiver Request conditioned, in part, upon the outcome of the proceeding in which the FWCC submitted its proposed rule amendments. There has been no Commission action to date on either FWCC's or Aviat's filings.

While Fastback, like Aviat, supports the broader rule update sought by the FWCC, the urgent need, not just from the point of view of manufacturers like Fastback and Aviat, but the broader needs of communications service providers and the public at large, can no longer wait for a rulemaking proceeding to be initiated by the Commission and completed. That was true when Aviat filed in its Waiver Request in 2013; it is all the more true today; and applies as well to Fastback.

An expeditious grant of the Aviat Waiver Request, to include Fastback, will reduce costs, further broadband deployment, and benefit U.S. providers and manufacturers, with no adverse effect on any party. We urge prompt action on these waiver requests.

Respectfully submitted,

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² Comments of the Fixed Wireless Communications Coalition in Response to the Commission's Notice of Inquiry in WT Docket No. 10-153 (filed Oct. 5, 2012). The FWCC subsequently filed an ex parte request that the Commission apply the co-polar discrimination (CPD) requirement to the range of angles 2.5-5 degrees from the centerline, rather than the 1.2-5 degrees presently required, and reduce the 25 dB cross-polarization discrimination (XPD) requirement to 21 dB. Letter from Mitchell Lazarus, Counsel, FWCC to Marlene H. Dortch, Secretary, FCC in WT Docket No. 10-153 (filed April 4, 2013) (collectively, the "Requested Rule Amendments").

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2015, a copy of the foregoing letter was sent by first-class, United States mail to the following:

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/s/ Deborah Wiggins